REMARKS

Claims 1-4 and 7-13 are pending in the present application. Claims 1-4 and 7-11 were rejected, and Claims 5 and 6 were withdrawn from consideration, in an Office Action dated 11/05/2003. Claims 1, 4, 8 and 10 have been amended, claims 5 and 6 have been cancelled, and Claims 12 and 13 have been added, herewith. Reconsideration of the claims is respectfully requested.

Amendments were made to the specification to correct errors and to clarify the specification. No new matter has been added by any of the amendments to the specification.

I. Restriction

Applicants affirm the election of Invention I, Claims 1-4 and 7-11.

II. Specification

Applicants have amended the Specification in an attempt to address the Examiner's comments/concerns regarding use of trademarks.

III. 35 U.S.C. § 102, Anticipation

A. The Examiner rejected Claims 8 and 11 under 35 U.S.C. § 102 as being anticipated by Beauchamp et al. (6,621,505). This rejection is respectfully traversed.

With respect to Claim 8, such claim has been amended to recited that the information received from the ERP interface is converted into a strongly typed object form. Applicants show that none of the cited references teach or suggest the claimed feature of "an ERP web gateway in communication with said web server for converting said requests from said web server into language format required by an interface of said ERP application and to convert information received from said interface of said ERP into a strongly typed object form". As can be seen, Claim 8 recites an ERP web gateway that performs two types of conversions – converting requests from a web server into language format required by an ERP application interface, and convert information received from such interface into a strongly typed object form. The cited reference merely teaches an BO (business office) gateway that provides a communication path between a process

server and the back-end enterprise system (Beauchamp Col. 19, lines 64-67). The business objects may be capable of accessing data and functionality (Beauchamp Col. 20, lines 6-8). There is no teaching of any type data conversion by a gateway, as claimed. Thus, amended Claim 8 is shown to not be anticipated by the cited reference.

B. The Examiner rejected Claim 7 under 35 U.S.C. § 102 as being anticipated by the J2EE 1.2 specification and accompanying reference applications published December 17, 1999. This rejection is respectfully traversed.

Applicants show that the cited reference does not teach the claimed feature of "A method of presenting strongly typed Java objects using HTML *by merging* Java objects with XML template files" (emphasis added by Applicants). In rejecting Claim 7, the Examiner states that the cited J2EE reference teaches this at pages 3-4, 5-5, 5-9, 5-10, and 5-14. Applicants have thoroughly reviewed these pages, and do not see any teaching or other mention of any type of merging operation, including merging of Java objects with XML template files to present strongly typed Java objects using HTML, as claimed. If the Examiner maintains this rejection, further clarification is requested as to where such merging is taught.

C. Applicants traverse the rejection of Claim 11 for similar reasons to those given above regarding Claims 7 and 8.

D. Therefore, the rejection of Claims 7, 8 and 11 under 35 U.S.C. § 102 has been overcome.

IV. 35 U.S.C. § 103, Obviousness

The Examiner rejected Claims 1-4, 9 and 10 under 35 U.S.C. § 103 as being unpatentable over the J2EE specification in view of Beauchamp et al. This rejection is respectfully traversed.

Applicants show that the cited references have been improperly combined using hindsight, and even when improperly combined there are still missing claimed elements – strongly evidencing non-obviousness. In combining the references, the Examiner states:

> "it would have been obvious to a person of ordinary skill in the art to use the method disclosed by the J2EE specification to implement the system described by Beachamp as this would bring the benefit of the wealth of design and deployment tools available for applications that use the J2EE specification."

Applicants show that this general statement – which essentially states that it would have brought a tool benefit – is not a sufficient showing of a motivation to combine these references. "[w]hen determining the patentability of a claimed invention which combines two known elements, 'the question is whether there is something in the prior art as a whole to suggest the desirability, and thus the obviousness, of making the combination.'" *See In re Beattie*, 974 F.2d 1309, 1311-12, 24 USPQ2d 1040, 1042 (Fed. Cir. 1992) (quoting *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 730 F.2d 1452, 1462, 221 USPQ 481, 488 (Fed. Cir. 1984)). There is certainly nothing in the cited art that suggests the desirability of making such combination. In fact, there is something in the cited art that would suggest a *non-desire* to make the combination. The Beauchamp reference provides for supporting legacy ERP applications. However, the cited J2EE reference expressly states its tools do not enable support for such legacy ERP applications (J2EE page 2-2, last sentence), and that such support will not be available until some undefined future release. This strongly evidences no motivation to combine the references as the J2EE teachings do not operate to support legacy ERP applications as taught by Beauchamp. The only motivation to combine the references comes from Applicants' own patent specification, which is improper hindsight analysis. It is error to reconstruct the patentee's claimed invention from the prior art by using the patentee's claims as a "blueprint". When prior art references require selective combination to render obvious a subsequent invention, there must be some reason for the combination other than the hindsight obtained from the invention itself. *Interconnect Planning Corp. v. Feil*, 774 F.2d 1132, 227 USPQ 543 (Fed. Cir. 1985). There is simply no reason to combine the references other than the hindsight obtained by the present invention.

Applicants will now show that even when the references have been improperly combined, there are still missing claimed elements – strongly evidencing non-obviousness.

With respect to Claim 1, Applicants show that none of the cited references teach or suggest the claimed feature of "merging said output data from said ERP application into a strongly typed Java object". In rejecting Claim 1, the Examiner states that this is taught by the J2EE specification on page 2-4. Applicants show that there, the J2EE specification states:

> "Database: The J2EE platform includes a database, accessible through the JDBC API, for the storage of business data. The database is accessible from web components, enterprise beans, and application client components. The database need not be accessible from applets."

As can be seen, while this cited J2EE passage does mention the existence of a database for storage of business data, it merely states that the database is "accessible". It does not teach or suggest any type of merging operation, including merging said output data from said ERP application into a strongly typed Java object. In addition, the J2EE specification expressly acknowledges that it does not yet support ERP applications. On page 2-2, it states:

> "A future release of this specification will describe standard ways to extend J2EE services with connectors to other non-J2EE application systems, such as mainframe and ERP systems."

Thus, it is not a reasonable interpretation of the J2EE specification to state that it teaches the claimed step of "merging said output data from said ERP application into a strongly typed Java object" as the reference does not teach such a merging step and also doesn't support ERP applications. Claim 1 is thus shown to not be obvious as there is at least one claimed element not taught or suggested by any of the cited references that are being used in rejecting such claim.

In similar fashion, as there is no teaching or suggestion of merging ERP application output data into a strongly typed Java object, there is no teaching or suggestion of transforming such strongly typed Java object into a transmittable format (since a Java object never existed, and thus there is nothing to transform). Claim 1 is thus further shown to have missing claimed elements not taught or suggested by the cited reference.

Further with respect to Claim 1, Applicants show that none of the cited references teach or suggest the claimed feature of "transferring any data entered by said user into said HTML input form and any data stored in said requested HTML page into said ERP application API". As can be seen, this claimed step is directed to transfer of two sources of data to the ERP application API. The Examiner states that Beauchamp Figure 7 teaches transferring data from said request into an ERP application. Applicants show that while Figure 7 shows a path between process server 202 and ERP system 204, it certainly does not teach or suggest that data flowing to the ERP system contains any data entered by a user, and any data stored in a requested HTML page. Therefore, Claim 1 is further shown to have been erroneously rejected under 35 U.S.C. 103.

With respect to Claim 2, Applicants initially traverse for reasons given above regarding Claim 1 (of which Claim 2 depends upon). Further with respect to Claim 2, Applicants show that none of the cited references teach or suggest the claimed feature of "wherein said merging step comprises the step of merging said output data from said ERP application into a strongly typed object form using an ERP Web Gateway, wherein said strongly typed object form comprises strongly typed Java objects". In rejected Claim 2, the Examiner states that Beauchamp discloses merging data from an ERP application using an ERP Web Gateway in Figure 7. Applicants show two-fold error in this assertion. First, Applicants are not merely recited "merging of data", but rather are specifically reciting that the data (from the ERP application) is merged into a strongly typed object. Beauchamp's Figure 7 does not teach or suggest such merger into a strongly typed object. Secondly, the claim recites that this merging is done using an ERP Web Gateway. The gateway shown by Beauchamp's Figure 7 is described at Beauchamp Col. 19, lines 64-67, where it states "The process server 202 communicates with the back-end enterprise systems 204 using business objects (BO) 216 through a business

object gateway 218." The cited gateway merely provides a communication path and does not provide any type of merging operation, as claimed. Thus, Claim 2 is further shown to not be obvious in view of the cited references as there are missing claimed elements not taught or suggested by the cited references.

Applicants initially traverse the rejection of Claim 3 for similar reasons to those given above regarding Claim 1 (of which Claim 3 depends upon). Applicants further traverse the rejection of Claim 3 by showing that none of the cited references teach or suggest the claimed feature of "wherein said HTML input form, dynamic ERP Application data access, Java objects definitions and HTML report form are stored in form of XML files". In rejecting Claim 3, the Examiner states that this is taught by the cited J2EE specification (e.g. 8-9). Applicants show that to the contrary, Claim 3 recites that all of the listed items are stored in form of XML files. The cited reference does not teach storing of all these items in XML files. For example, dynamic ERP Application data access is not taught or suggested by the cited reference in any fashion, so it can't be reasonably stated that such is stored in an XML file. The passage cited by the Examiner merely describes XML grammar for a J2EE application deployment descriptor, but does not teach or otherwise suggest storing of the listed items of Claim 3 in an XML file. Thus, Claim 3 is further shown to not be obvious in view of the cited references.

Applicants initially traverse the rejection of Claim 4 for similar reasons to those given above regarding Claim 1 (of which Claim 4 depends upon). Applicants further traverse the rejection of Claim 4 by showing that none of the cited references teach or suggest the claimed feature of "wherein said XML file strongly couples said data in said ERP Application to said Java objects and said XML file which specifies the presentation of said Application data". As can be seen, Claim 4 states that the XML file specifies presentation of the ERP Application data. In rejecting Claim 4, the Examiner states that this is taught by the cited J2EE specification. Contrary to this assertion, Applicants show that the J2EE specification explicitly states that it does not provide support for ERP applications (as discussed above regarding Claim 1), so it is not seen how this specification teaches or suggests an XMP file that specifies presentation of ERP Application data. Thus, Claim 4 is further shown to not be obvious in view of the cited references.

Applicants traverse the rejection of Claim 9 for similar reasons to those given above regarding Claim 1 (of which Claim 9 depends upon).

Applicants traverse the rejection of Claim 10 for similar reasons to those given above regarding Claim 4 (of which Claim 10 depends upon).

Therefore, the rejection of Claims 1-4, 9 and 10 under 35 U.S.C. § 103 has been overcome.

V. Newly Added Claims

Claims 12 and 13 have been added herewith, and examination of such claims is respectfully requested.

VI. Conclusion

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: 2/5/04

Respectfully submitted,

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